

	<p>Privacy</p>	<p>CUSTOMER PRIVACY POLICY</p>	
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CUSTOMER PRIVACY - Information sheet pursuant to Article 13. of EU Reg. 2016 / 679 - GDPR - Policy regarding the processing of personal data collected from the interested party

In compliance with the provisions of EU Reg. 2016/679 (European Regulation on the protection of personal data), we are presenting you with the necessary information regarding the processing of the personal data you have provided. This disclosure is provided pursuant to Article 13 of EU Reg. 2016/679 (European Regulation for the protection of personal data).

DATA CONTROLLER – ALBA SRL, with registered office in Rodengo Saiano - BS, Via Monticella nr.14/16/18 2, 25050 - in the person of its legal representative.



Data controller's contact details are: tel. +39 030 7284011 email:privacy@alba1972.it.

"Personal data" means any information concerning an identified or identifiable natural person ("data subject"); an identifiable natural person is one that can be identified, directly or indirectly, by means of a particular identifier such as a name, an identification number, location data, an online identifier or by means of one or more specific features related to their physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30).

The personal data that will be processed for the purposes indicated below are specifically:

- name, surname, contact details, tax code, VAT number, e-mail, company function relating to natural persons (e.g. legal representative, employees / consultants, company contacts in general) for the stipulation and execution of the business relationship with the client company.

PURPOSES OF DATA PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD
<p>Purpose A)</p> <p>Necessary processing under a contract or for the purpose of concluding a contract and related accounting and pre-contractual administrative activities;</p>	<p>Contract</p> <p>art. 6 lett. b) GDPR processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Fulfillment of legal obligations</p> <p>art. 6 co. 1, lett. c) GDPR</p>	<p>10 years or as per different legal requirement</p> <p>Art. 2220 C.C.</p>
<p>Purpose B)</p> <p>SOFTSPAM: commercial / promotional information activity, newsletters by e-mail to the e-mail address provided during the sale process, concerning the same type of product and / or service similar to the product / service being sold - art. 130, paragraph 4 of Legislative Decree 196/03 / on legitimate interest (art.6 lett. F) EU Reg. 2016/679), subject to opposition.</p>	<p>Art. 6 let. f) and recital 47: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, taking into account the reasonable expectations of the subject based on his relationship with the data controller.</p>	<p>Until their opposition,</p>

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DATA RECIPIENTS OR CATEGORIES OF RECIPIENTS

The personal data provided may be communicated to appropriately appointed recipients who will process the data as data processors and/or as appointees (art. 28 of EU Reg. 2016/679) and / or as natural persons acting under the authority of the Data Controller and Data Processor (art.29 of EU Reg. 2016/679), for the purposes listed above. The data can be made available to:

- subjects that provide services for the management of the information system and communication networks (e-mail included);
- firms or companies providing assistance and consulting services;
- competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, where required;
- in case of administrative and accounting purposes, the data may possibly be transmitted to commercial information companies for the assessment of solvency and payment habits and / or to subjects for credit recovery purposes.

Subjects belonging to the aforementioned categories are Data Processors, or operate in total autonomy as separate Data Controllers.

DATA TRANSFER TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANISATION

The personal data provided will not be transferred abroad to non-EU countries.

NATURE OF THE COLLECTION AND REFUSAL

The collection of data:

- **purpose A)** is necessary for the conclusion of the contract between the parties and for the purpose of managing the fulfillment of administrative / accounting obligations always respecting the existing contract. Failure to provide will make it impossible to execute the contract;
- **Purpose B)** is optional. Failure to provide makes it impossible for the Data Controller to send promotional newsletters. In case of opposition to data processing for marketing purposes, the email addresses of those contacts who oppose will no longer be used for direct marketing purposes.

RIGHTS OF THE PARTIES

In the cases provided for, the data subjects have the right to obtain access to their personal data and its rectification or cancellation, or the limitation of its processing or to oppose its processing (Articles 15 and subsequent amendments of EU Regulation 2016/679). Moreover, in the cases provided for, you have the right to data portability and in this case, the Data Controller will provide you with your personal data in a structured format that is commonly used and readable by an automatic device. In order to stop receiving automated direct marketing communications (soft spam via e-mail tool), simply send an e-mail to privacy@alba1972.it at any time, with "softspam cancellation" as subject or use our automatic cancellation systems for e-mails only.

Interested parties who believe that the processing of personal data referred to them takes place in violation of the provisions of the Regulation have the right to lodge a complaint before the Supervisor Authority - Italian Guarantor (<https://www.garanteprivacy.it/>), as provided by art. 77 of the Regulation itself, or to refer to the appropriate judicial offices (art. 79 of the Regulation).

Update date: 1st July 2020

THE DATA CONTROLLER

ALBA SRL